

UNITED STATES DISTRICT COURT

for the

Middle District of North Carolina

Greensboro Division

Ronald Hugh Hutton

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

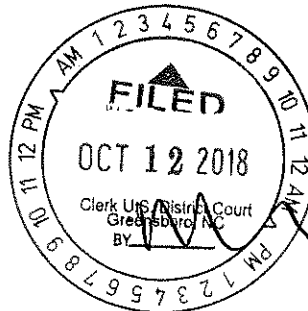
U.S. Department of Veterans Affairs

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

~~18CV869~~ 18CV869
(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

| | |
|--------------------|-----------------------|
| Name | Ronald Hugh Hutton |
| Street Address | 407 E. Washington St. |
| City and County | Greensboro, Guilford |
| State and Zip Code | NC 27401 |
| Telephone Number | 336-332-0824 |
| E-mail Address | |

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name

V.S. Department of Veterans Affairs

Job or Title (if known)

Street Address

810 Vermont Ave. NW

City and County

Washington, District of Columbia

State and Zip Code

20420

Telephone Number

E-mail Address (if known)

Defendant No. 2

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Defendant No. 3

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Defendant No. 4

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

42 U.S.C. 1983

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the
State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of
the State of *(name)* _____ . Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

Or is incorporated under the laws of *(foreign nation)* _____, and has its principal place of business in *(name)* _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Please see attached sheet entitled "III. Statement of Claim"

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I request that the U. S. Department of Veterans Affairs please remove the "label" that they designated me with 3 decades ago. Thank you.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

10/12/2018

Signature of Plaintiff

Printed Name of Plaintiff

Ronald Hugh Hutton
Ronald Hugh Hutton

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____

III. Statement of Claim

I was designated with the 'label' of "mentally disabled veteran" back in 1988, by the U. S. Department of Veterans Affairs. In the present day, potential employers, or any woman who might be mutually interested in me, may learn of this 'label' through a third party somehow. These employment establishments, and any woman who could be a potential date, are referred to as potential avenues of life progress and enrichment ("potential P & E avenues") from here on out. "Potential P & E avenues", may draw conclusions about my character and abilities, based on the "label" alone. In addition, society in general probably affiliates anyone designated with a 'label' as such, as having frowned upon personality traits.

There may have been some issues I have had , that caused me to have impulses and other problems, which led me to be designated with that 'label', way back in 1988. I speculate that these issues were mostly caused by interrogating neighbors who rented the house next door, when I was a teenager. I feel I have worked through a lot of these issues within myself, that were causing me to have those impulses and problems. Thus it is all in the past now. I still have a lot of problems in the present day though, but not "those" types of problems.

One of the problems I have in the present day, is that my ability to concentrate and remain focused on an activity, has probably been exacerbated. I know I have always been somewhat preoccupied. Although in recent years, worsened thought wandering does not seem to me, to be attributed to any type of mental problem. Most onlookers probably do not see that my worsened thought drifting in late adulthood, is mostly due to negative communication about me, that is supposedly taking place behind my back. This has caused me to be extremely worried, which leads to thought drifting, as I elaborate below.

Some landlords of one of my previous residences, are presumably communicating derogatory descriptions of my character and abilities, to residents and potential employers, in the community where I reside. Some of the jobs I have applied to, have been fast food restaurants. In addition, these former landlords are supposedly degrading my reputation in degrading communication to any woman I occasionally meet and have a few conversations with, where there might be mutual romantic interest.

The former landlords appear to somehow learn of jobs I apply to, and my social endeavors, then supposedly find out contact information for these "potential P & E avenues". They then supposedly proceed to belittle my reputation through direct and/or indirect communications to these "potential P & E avenues".

The former landlords may make it look to the "potential P & E avenues" like they have the inside scoop, and are doing them a favor, by telling them that I am a "bad egg".

I speculate that the descriptions about my character and abilities, presumably conveyed by these former landlords, does not pertain to present day context. Yet nevertheless, I conjecture that their communications about the past, can introduce preconceived notions in the perceptions that 'potential P & E avenues' harbor of me, in the present day.

Fifteen years ago, when I applied to rent a unit in the apartment complex that the former landlords own in Mebane, NC, they asked me how long I planned to stay in Mebane. I told them probably indefinitely. The former landlords asked me that if I were to rent from them, if I would be willing to do grounds keeping and clean other vacant units, for diminished rent, which was only \$100.00 a month. I said I would be willing. So I filled out the application, was approved, and moved in.

Although I was unaware at the time, of the stipulations included in how they set the property up. The former landlords have kept me from knowing this. However, I have learned after the fact, that these landlords set their property up in such a way, that if I were to move out, it would instigate a lien in their property. I am not aware of the details. So I lived there for almost 10 years, then decided to move out. And as just explained, when I moved out, it did it cause a lien in their property, though again not to my knowledge at the time. The former landlords incurred about \$100,000 debt.

The only way that the lien can be restored, is for me to move back into that apartment. Thus these former landlords appear to be scheming a conspiracy of reputation tarnishment behind my back, in effort to discourage potential employers from hiring me. And likewise deter any potential romance, from getting involved with me. By ruining my reputation with these two "potential P & E avenues", they can render me as broke and miserable. And I would continue to have a frowned upon reputation with potential employers. That way, the only habitation I could really afford to rent, is the apartment in Mebane that is owned by the former landlords. Thus if I move back there, since the property lien would be restored, it would prompt the reimbursement of all the \$100,000, back to them.

Basically it appears that the objective of these former landlords, is to deprive me of opportunities. Where if I were granted these opportunities, and did well, it would show that I am fully capable of doing well on a full time job in my career field, or fast food, or other full time job. And it would also show that there are no "problems" I have on a job, that the former landlords supposedly say I would have. Nor do I get opportunities in romance either, by the same token.*

I speculate that there has been some videotaping of my endeavors taking place, when I eat at some fast food restaurants that I have applied to. I presume that anyone can view this film footage. If I am being observed by fast food hiring managers, so they can evaluate my behavior as a customer, and thus extrapolate how I would do on the job - the former landlords may be viewing the film footage and contacting these fast food hiring managers.

If the former landlords are doing so, they may be relaying their perceptions of acts they see me do, and words they hear me say on the film footage, to the restaurant manager, without consulting with me about it first. I would not want to discuss anything with the former landlords, other than how they perceived the film footage. I would not even want them to ask me how I am doing. If the former landlords were to consult with me personally about what they saw and heard on the film footage of me, before they relay their perceptions to the restaurant manager, I might shed some light on the former landlords' perceptions, which may be based on a misinterpretation. I would do this, by revealing my true intentions of my acts and dialog, to the former landlords. Then likewise I would communicate the same to the hiring manager. Following, I would expect that the restaurant manager would most likely see that my words and deeds are by and large legitimate and make sense.

This is presumably why the former landlords never include me in their supposed third party communications to 'potential P & E avenues'. Because the former landlords know that I would contradict their rationale, by applying common sense principles.

Therefore I suspect that my extreme wandering of thoughts in the last 6 years or so, is attributed to the idea that these very persuasive, manipulative, deceptive, clever, and flashy former landlords, who have clout and the gift of gab, are doing as described in the previous 2 paragraphs, behind my back. Thus the hiring manager may get a skewed perspective of my character and abilities, and therefore assess me inaccurately. This causes me an extreme amount of worrying. And the extreme worrying causes me intense mind wandering.

My thought drifting is much worse today, than it was at a time when there was no reputation libel occurring behind my back. Such as in the year 2008. I had been off of my blood pressure medicine for about a year then, if I recall correctly. I worked on a temporary job in the spring of 2008 through a staffing agency, at LabCorp, in Burlington, NC. Then I got hired on a subsequent temporary job with the same staffing agency, that summer in 2008. That is to say I was focused enough on the job, to do well, keep the job, and acquire another temporary job. The former landlords were not there, and had not yet started to ruin my reputation.

However, upon me moving out of the former landlords' apartment, that is when the reputation degradation appeared to commence. The job I acquired in the spring of 2010, was ironically at LabCorp, although at a different location and through a different staffing agency. I worked on a temporary job in the Clinical Trials Division of LabCorp in Research Triangle Park, NC. It appeared that one of the former landlords, Mrs. Betsy Orr, conjoined behind the scenes, with my immediate supervisor, named Evelyn. Evelyn appeared to be trying to make my job performance look bad, so that she could have a legitimate basis to terminate me. And she presumably did so. Yet I was told by the staffing agency that I was no longer needed. Evelyn, from Hillsborough, NC, attended Lynchburg College in Virginia, the same college that former landlord Betsy Orr attended. They appear to be about the same age, which is near my age, and may have graduated in the same class at Lynchburg College.

I would be sure that pressure that a worker on the job deals with, is different from pressure that a worker goes through, from people outside of the job, trying to make the worker fail, by third party negative networking.

The former landlords, listed below, are presumably using the 'label', as a springboard to ruin my reputation with these 'potential P & E avenues', including fast food restaurant managers.

The former landlords are:

Alli and Drew Larsen, Williamsburg, VA
 Betsy and Bill Orr, Milton Village Ln., Charlottesville, NC, and Bill's sister Betty
 Catherine Orr married name?, and speculated husband Graham, Oak St., Carrboro, NC
 Jerry Bowen, Keats Pl., Raleigh, NC
 Genie Wynn, Overland Dr., Chapel Hill, NC
 Cynthia and Will Ferrell, Breyerle Rd., Henrico, VA
 Evan in Texas, maybe Dallas or Houston

If the aforementioned opportunities, with the specified conditions were to be granted:

1) I obtain a full time job in my career field, such as veterinary assistant/tech, or laboratory assistant/tech. Or else I get a full time job at a fast food restaurant, in retail, animal facility, grocery store, housekeeping, or similar job. By the way, I have two Associate's Degrees, one in Veterinary Technology, and the other in Biotechnology.

2) The former landlords previously mentioned, refrain from directly or indirectly communicating to any potential employers, or any woman I acquaint where there might possibly be mutual romantic interest. The former landlords do not communicate directly nor indirectly with residents in the community I reside, nor with anyone whom I receive professional or leisure services from. The leisure services I'd use could take place outside of Charlotte, NC. Not to mention, if I do land a job, if the former landlords refrain from directly or indirectly communicating by way of a third party, to any of the supervisors or coworkers.

Then I would expect that I would do at least reasonably well on a job. Especially amidst unbiased coworkers and supervisors.

Consequently, I would suppose that it would stand to reason, that me being assigned with a 'label' as such, is not necessary.

*There may also be an issue in dating, that appears to be causing me an immense amount of worry, and thus preoccupation of thought as well.